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Before the
FEDERAL COMMUNICATIONS COMMISSION
 Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
 OFFICE OF THE SECRETARY

In the Matter of

Proposal to Revise the)	DA 02-2732
Multichannel Multipoint)	
Distribution Service and the)	
Instructional Television Fixed)	
Service Rules)	RM-10586

To: The Wireless Telecommunications Bureau

COMMENTS OF COMSPEC CORPORATION

ComSpec Corporation ("ComSpec") hereby submits its Comments in response to the Commission's Public Notice of 17 October 2002 in the above-referenced proceeding requesting comment on the white paper entitled "A Proposal for Revising The MMDS and ITFS Regulatory Regime" (the "Proposal") filed 7 October 2002 on behalf of the Wireless Communications Association International, the National ITFS Association and the Catholic Television Network.

ComSpec is a telecommunications consulting firm with significant experience in the interference studies and application process required by the Commission's Rules for the authorization of MMDS and ITFS facilities. Over the past ten years, ComSpec has been involved with the development of coordinated traditional and two-way MMDS and ITFS stations in over 100 markets in the United States.

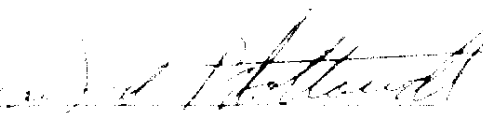
The Proposal recommends renovation of the current regulatory framework for MMDS and ITFS stations to support deployment of advanced two-way wireless broadband services. The white paper containing these recommendations is the result of thousands of hours in analysis, research and discussions by a task group consisting of MMDS and ITFS operators, vendors, attorneys and technical consultants. ComSpec **proudly served** as an active member of this **task** group and enthusiastically supports the Proposal,

The current Rules for MMDS and TTS stations are based on the deployment of broadcast-style facilities serving a large service area from a single centrally-located transmitting site. While revisions have been incorporated into these guidelines to allow authorization of two-way digital facilities, the existing application requirements for each channel group at each site preclude practical and timely deployment and coordination of advanced wireless broadband services in this band. To be competitive today, wireless broadband operators need the ability to quickly deploy and adjust system parameters in response to changing market conditions. The Proposal not only supports this type of scalability, but provides practical interference protection to and from other operators and to and from traditional high-power, single site stations.

While the changes and guidelines proposed in the white paper are complex, ComSpec believes the Proposal will encourage the most efficient deployment of advanced wireless broadband services to the public. For these reasons, ComSpec strongly urges the Commission to expeditiously incorporate the Proposal into a Notice of Proposed Rulemaking.

Respectfully submitted,

ComSpec Corporation

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21 November 2002